

ELISE O'BRIEN, State Bar No. 245967  
R. JASON READ, State Bar No. 117561  
RYNN & JANOWSKY, LLP  
2603 Main Street, Suite 1250  
Irvine, CA 92614  
T: (949) 752-2911; F: (949) 752-0953  
E-Mail: [elise@rjlaw.com](mailto:elise@rjlaw.com); [jason@rjlaw.com](mailto:jason@rjlaw.com)

Attorneys for Defendant  
CUSTOM PRODUCE SALES

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

## EXPORT DEVELOPMENT CANADA,

**CASE NO. 21-cv-00684-DAD-SKO**

Plaintiff,

**STIPULATION TO EXTEND TIME  
TO RESPOND TO COMPLAINT BY  
NOT MORE THAN 28 DAYS; ORDER**

## CUSTOM PRODUCE SALES,

(Doc. 6)

V.

Defendant.

Defendant Custom Produce Sales and Plaintiff Export Development Canada, by and through their attorneys of record in this case, hereby stipulate and agree that:

WHEREAS, Plaintiff filed its Complaint in this action on April 23, 2021 (ECF No. 1);

WHEREAS, Defendant's responsive pleading is due on May 18, 2021;

WHEREAS, Defendant requested, and Plaintiff agreed to, a brief three (3) day extension of time to respond to the Complaint;

WHEREAS, the extension of time will not alter the date of any event or deadline already fixed by the Court;

WHEREAS, Local Rule 144(a) of the United States District Court for the Eastern District of California provides that the parties may stipulate to extend the time for responding

1 to a complaint without leave of Court so long as all parties effected by the extension consent  
2 and the extension is no longer than 28 days;

3 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,  
4 through their respective counsel, that Defendant shall file its responsive pleading by May 21,  
5 2021.

6 **IT IS SO STIPULATED.**

7 RYNN & JANOWSKY, LLP

8  
9 DATED: May 19, 2021

By: /s/ Elise O'Brien  
10 ELISE O'BRIEN, Attorneys for Defendant  
11  
12 CUSTOM PRODUCE SALES

13  
14 BLAKELEY, LLP

15 DATED: May 19, 2021

16 By: /s/ Sean J. Lowe (as authorized on 5/17/21)  
17 SEAN J. LOWE, Attorneys for Plaintiff  
18 EXPORT DEVELOPMENT CANADA

19  
20 **ORDER**

21 The Court, having duly considered the parties' stipulation set forth above (Doc. 6),  
22 and good cause appearing, orders as follows:

23 Defendant's deadline to file a responsive pleading to Plaintiff's Complaint is extended  
24 to May 21, 2021.

25 IT IS SO ORDERED.

26 Dated: May 19, 2021

27  
/s/ Sheila K. Oberlo  
UNITED STATES MAGISTRATE JUDGE